To: The Federal Communication Commission
Re: GMRS Proposed Rule Changes and Civilian Emergency Communication (10-119)

General Concern

I wish to add my concerns to those already submitted which implore the FCC to play a clear and positive role in supporting a useful civilian defense radio communication infrastructure.

Across the country FEMA?s Community Emergency Response Team program (CERT) has spawned thousands of neighborhood emergency response groups, most of which rely upon FRS communications for use in civilian disaster response and recovery operations.

These groups have become something of a movement in the civil defense world involving tens of thousands of citizens, but they have been hindered by the complications of the current FCC FRS/GMRS rules in combination with the reality of the handheld radio marketplace. I urge the Commission to recognize the national importance of this situation and take into consideration the needs of these groups when planning GMRS rule changes.

The Overall Problem

It is clear in our area that the CERT format as it is currently constituted falls short in the area of agency-civilian disaster communication because under the current FCC guidelines?and given the realities of the current marketplace?permissible usage of widely available, affordable equipment cannot satisfy the most needed requirements.

Specifically, the Police and Fire Chiefs I?ve spoken with over the years have all said consistently that the assistance they?d like to receive from the neighborhood groups during and following an emergency is not primarily in the realm of operational support, but rather they?d like to receive immediate damage reports so that they can more quickly gauge the extent of the damage and the consequent needed response.

The presumed communication model for this is that neighborhoods would collect their information on FRS, then send this to an amateur radio operator who could send it on to a RACES (Radio Amateur Civil Emergency Service) or ARES (Amateur radio Emergency Service) group which would be supporting the local Emergency Operations Center (EOC).

Unfortunately, this model has proven infeasible for several reasons. Principal among these is the fact

that there simply are not enough active amateur radio operators around who can support the neighborhoods. Therefore, neighborhoods need access to a radio service which will allow them to make contact with their counterparts at the EOC so that information can be quickly collected, filtered and passed on to the emergency responders and managers. In other words, they need some local users to have access to affordable equipment which can transmit at up to 50 watts. These individuals may also require access to a GMRS repeater, especially in areas that are remote, undulating or widespread such as are more common in Western states than in the East.

The GMRS rules could be easily modified by the FCC to suit the civil defense needs of citizens and emergency responders.

Discussion

Canyon, California is an unincorporated community of about 100 households which is susceptible to sudden catastrophic wildfire and is located to the east of the San Andreas and Hayward Faults and to the west of the Calaveras Fault. Given that the response time from the County Sheriff is about 45 minutes?and given the fact that Fire agencies do not evacuate communities?in a wildfire situation the onus for knowing who?s out and who?s remaining falls upon the community. Likewise, following a serious earthquake, damage assessment and immediate medical attention will be the responsibility of the community owing to our isolation.

Clearly, emergency radio communication is a major supporting factor in our operations. There is no better way to rapidly communicate in these conditions. Back in 2007, when we were confronted with the existence of these responsibilities, we quickly went from having zero licensed ham radio operators in the community to having ten. This is close to 3% of our overall population, which is outstanding...but it is still not nearly enough to meet our safety needs because we also need a radio system which can reach unlicensed operators with inexpensive radios.

We?ve done testing with ?bubble pack? FRS/GMRS radios and have found that, even in a community as small as ours, coverage is markedly limited owing to the abundance of side canyons in our terrain. The only two possible ways we can hope to send urgent messages quickly to the entire community is by high power GMRS transmission or by using a local GMRS repeater. Therefore, we urge the FCC to allow the continued usage of GMRS high power transmission and repeaters for licensed users.

Cost is a serious impediment to the development of our response capacity and we would be grateful if the FCC did what it could allow us to operate as cheaply as possible.

? First we would ask the FCC to create a two tiered user system for GMRS usage with the first tier being unlicensed users with handheld radio privileges and the second being licensed users with high

power and repeater privileges. We would ask the following:
1. The length of the licensing period be doubled
2. The fee be decreased to be more in line with the ham radio license fee
3. There be an exemption from the prohibition of group licenses for civilian emergency response and support groups.
? Secondly, we would request that persons who hold both amateur radio and GMRS licenses explicitly be permitted to operate on GMRS channels with modified ham radio equipment. The fact that dual use radios would not be sold would avoid the present problem of the combination FRS+VHF Marine Band radios and, additionally, it would be a cost savings to groups of ham/GMRS operators with small budgets, not to mention a convenience
? Lastly, we would suggest that the FCC designate four or five GMRS channels to be given priority for civilian emergency response or training usage. If such a strong policy were made, it should clear the way for manufacturers to have sufficient economy of scale to produce GMRS base stations for the thousands of CERT, American Red Cross chapters and related groups across the country.

Recommendations
In summary,
? Average citizens need access to cheap low powered radios (perhaps up to 5 watts) that require no license.
? Licenses for operations up to 50 watts should continue to be made available along with usage of GMRS repeaters.
? Civilian emergency response groups should be eligible to receive group licenses in order to use high power & GMRS repeaters.
? The FCC should designate four or five GMRS channels for priority and emergency traffic in the event of a public safety emergency or training.
? FRS/GMRS radios be manufactured so that FRS only channels transmit using only half a watt and users of those radios be encouraged to use the FRS channels so as to minimize interference from other users.

Conclusion
Again, I urge the Commission to facilitate development of this form of public communication service. Not only will it aid Rescue, Fire and Law Enforcement personnel and managers by affording them a means to gather civilian damage assessments following a disaster, and not only will it help independent local citizen groups respond to, sort out and recover from the effects of catastrophic wildfire, earthquake, hurricane, etc., but the development of ongoing agency-citizen radio communication collaboration engenders a spirit of co-operation and cohesion not otherwise

achievable.

I thank you for your consideration of these comments.
~Jonathan Goodwin, WQJX875/KI6QNT
Canyon Fire Council
Canyon, Calif.